

U.S. Department of Justice

United States Attorney Eastern District of New York

F. #2019R00102

271 Cadman Plaza East Brooklyn, New York 11201

December 23, 2019

BY HAND DELIVERY AND ECF

The Honorable Raymond J. Dearie United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Jose Carlos Grubisich

Criminal Docket No. 19-102 (RJD)

Dear Judge Dearie:

Enclosed please find a stipulation and proposed order governing discovery materials to be provided by the government in the above-captioned case. The stipulation has been signed by the government, the defendant Jose Carlos Grubisich and counsel for the

defendant Edward Kim, Esq. The government respectfully requests that the Court so order the stipulation.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/ Julia Nestor
Alixandra E. Smith
Julia Nestor
Assistant United States Attorneys
(718) 254-7000

ROBERT A. ZINK Chief, Fraud Section Criminal Division U.S. Dept. of Justice

By: /s/ Lorinda Laryea
Lorinda Laryea
Leila Babaeva
Trial Attorneys
(202) 353-3439